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June 2, 1992

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JUN - 2 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY


Re: CC Docket No. 92-77 -- Billed Party Preference for
0+ InterLATA Calls

Dear Ms. Searcy:

Transmitted herewith for filing on behalf of PhoneTel Technologies, Inc. are an original and five copies of its initial comments on proprietary calling cards and 0+ access. In accordance with the procedural schedule set forth in the Commission's notice of proposed rulemaking in this proceeding (FCC 92-169, released May 8, 1992), these comments are limited to addressing whether the Commission should restrict the use of proprietary calling cards on 0+ dialing. Comments on the Commission's billed party preference proposal will be submitted on July 7, 1992.

If there are any questions, please communicate directly with the undersigned.

Sincerely,



Mitchell F. Brecher

MFB/pmd
Enclosure

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
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Billed Party Preference)
for 0+ InterLATA Calls)
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CC Docket No. 92-77

COMMENTS OF PHONETEL TECHNOLOGIES, INC
ON PROPRIETARY CALLING CARDS AND 0+ ACCESS

Mitchell F. Brecher

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SUMMARY

AT&T Communications has embarked upon a course of sending to holders of AT&T calling cards new cards issued in the Card Issuer Identifier (CIID) format. Although these cards include CIID codes created and assigned to AT&T by Bell Communications Research as part of that entity's administration of the North American Numbering Plan (a public resource) and although those cards are usable to initiate calls on a 0+ dialing basis, AT&T permits those cards to be validated only by itself and the nation's local exchange telephone carriers -- its former long distance partners. CIID cards are not universally accepted cards. Rather, they have become "Integrated Monopoly" cards since they can be used only in connection with the services of those carriers that were joint providers of telecommunications services prior to the industry restructuring brought about by divestiture.

While any interexchange carrier may obtain CIID codes and issue calling cards in the CIID format, only AT&T has any practicable ability to do so. This is so for several reasons, including the fact that AT&T's extensive embedded base of calling card holders is built upon the local exchange carriers' base. Millions of LEC calling card customers received unsolicited AT&T calling cards simultaneous with divestiture.

According proprietary treatment to CIID cards disservices the interests of consumers. As a result of the requirements of TOCSIA and the Commission's rules, consumers are fully informed

of the identity of the carrier handling 0+ calls. Further, even today, many 0+ calls charged to AT&T CIID cards are not completed and billed by AT&T at AT&T rates despite what consumers may expect. The recent experience of telecommunications network outages further demonstrates that proprietary calling cards will disserve the public since millions of holders of such cards may become stranded without available telephone service if the carrier issuing proprietary cards experiences a service outage.

If CIID cards are to be afforded proprietary treatment at all, it should be only on an access code dialing basis. 0+ dialing is an inappropriate means to initiate a call charged to a proprietary calling card.

PhoneTel offers the Commission the following specific recommendations :

1. Forbid calling cards issued in the CIID format from being used to charge calls to any carrier -- IXC or LEC -- other than the "issuing" carrier unless those cards are made available on a nondiscriminatory basis for validation and acceptance by all carriers desiring to be able to validate and accept those cards;

2. Prohibit all proprietary calling cards (i.e., those that are issued in a proprietary format and not available for validation by any other carriers) from being available for use on a 0+ basis;

3. Require any carrier issuing proprietary calling cards to furnish card holders with appropriate dialing instructions in promotional materials and on the cards

themselves. Such instructions should indicate that 0+ dialing is not allowed unless the originating telephone is presubscribed to the card issuing carrier;

4. Direct AT&T and any other carrier which has used false and misleading statements in materials accompanying distributed calling cards in the CIID format to cease and desist from distributing materials containing such false and misleading statements and to send written statements to all recipients of such materials correcting those previously sent.

Before the
FEDERAL COMMUNICATIONS COMMISSION
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of
Billed Party Preference
for 0+ InterLATA Calls

CC Docket No. 92-77

COMMENTS OF PHONETEL TECHNOLOGIES, INC
ON PROPRIETARY CALLING CARDS AND 0+ ACCESS

PhoneTel Technologies, Inc., ("PhoneTel"), by its attorneys, hereby submits its initial comments on proprietary calling cards and 0+ access. These comments are in response to the Commission's notice of proposed rulemaking in this proceeding released May 8, 1992.^{1/}

I. INTRODUCTION

PhoneTel is an interexchange telecommunications carrier headquartered at Cleveland, Ohio. Its primary business is the provision of operator-assisted calling services from public telephones -- local exchange carrier-provided and private -- and from other aggregator locations. It provides these services in full conformance with the Telephone Operator Consumer Services

^{1/} Billed Party Preference for 0+ InterLATA Calls, FCC 92-169 (Notice). In the Notice, the Commission proposed and sought comment on a system of billed party preference for 0+ calls from public (and possibly other) telephones. Comments on the billed party preference proposal are due July 7, 1992. In addition, the Commission solicited comments on issues governing certain practices associated with proprietary calling cards. These comments are limited to that request. PhoneTel plans to comment on the Commission's billed party preference proposal at the appropriate time.

Act of 1990 ("TOCSIA")^{2/} and with the Commission's rules governing operator services^{3/}.

As a competitive provider of interexchange services, including operator-assisted services, PhoneTel's business and its ability to serve consumers have been adversely impacted by the recent proliferation of AT&T calling cards issued in the Card Issuer Identifier ("CIID") format available for use on a 0+ dialing basis and by the tactics engaged in by AT&T to distribute and promote usage of those cards. As will be demonstrated in these comments, AT&T's CIID card program has been implemented in a manner which inconveniences and misleads consumers, undermines interexchange competition and enables AT&T to enjoy one more derivative benefit from its historic status as a participant in the nation's former integrated monopoly telecommunications infrastructure. Accordingly, PhoneTel urges the Commission to mandate interim procedures governing interexchange carrier calling cards usable on a 0+ basis which will preserve opportunities for competition while the Commission continues to consider appropriate regulations for competitive services from public communications facilities.

^{2/} Public Law 101-435, 104 Stat. 987. TOCSIA is codified at Section 226 of the Communications Act of 1934, as amended. (47 U.S.C. § 226 (1991)).

^{3/} 47 C.F.R. § 64.703 et seq.

II. PROPRIETARY ACCEPTANCE OF CIID CARDS UNDERMINES DEVELOPMENT OF FULL AND FAIR INTEREXCHANGE COMPETITION

Historically, AT&T and all of the local exchange telephone carriers ("LECs") maintained a system of "shared" calling cards, i.e., calling cards issued by AT&T or LECs could be used to charge telephone calls either to AT&T or to any LEC. Such shared use was possible as a result of the data bases developed by the integrated Bell System prior to divestiture and participated in by the so-called "independent" LECs. Recognizing that the shared data bases would be terminated at the end of 1991, the Bell Operating Companies ("BOCs") developed a plan for calling cards that would enable cards to be acceptable for interLATA as well as for intraLATA and other local calling. Under this plan, Bell Communications Research ("Bellcore"), an entity wholly-owned by the seven Regional Bell Operating Companies, would establish and assign a series of four digit codes for inclusion in calling card numbers. These so-called CIID codes would identify the card issuing carrier. Interexchange carriers could issue cards in the CIID format and have those card numbers accepted and validated by LECs and therefore be usable for interLATA and for intraLATA and local calling.

The intent of the CIID card plan was to enable callers to be able to use a single telephone calling card for interLATA as well as intraLATA calls. It was not to create a series of cards which would be universally acceptable for local and

intraLATA calling but acceptable by only one carrier for interLATA calling. While the intent of the CIID plan may have been to create a universally acceptable card, implementation of the CIID card plan by the LECs and AT&T has created instead an "Integrated Monopoly" card. CIID cards can be used to charge calls only in connection with the services of those carriers that were joint providers of long distance telephone service prior to January 1, 1984, i.e., the BOCs, independent LECs and AT&T. All other carriers are excluded from being able to accept those cards.

Although CIID codes are nominally available to all carriers, it is impracticable for any IXC other than AT&T to issue cards in the CIID format. AT&T knows this. Its competitors know this. The LECs know this. In all likelihood, the Commission knows this. There are multiple reasons why AT&T -- and only AT&T -- is able to benefit from the BOCs' CIID card plan. First, AT&T continues to dominate the market for all interexchange services, including calling card services. The fact that, for eight years following divestiture, AT&T and the LECs shared calling card numbers and data bases, affords AT&T an enormous marketing advantage^{4/}. Indeed, AT&T's post-divestiture

^{4/} Indeed, for five years following divestiture, AT&T remained the monopoly provider of all 0+ interLATA calling services from LEC public telephones. The Modification of Final Judgment's equal access requirements were not applied to BOC public phones until 1989 pursuant to a court decision which mandated a system of premises owner presubscription as the means for ending access discrimination at public phones. See, United States v. Western Electric Co., Inc., 698 F. Supp. 348 (D.D.C. 1988).

base of calling card holders includes millions of LEC calling card customers who received unsolicited AT&T calling cards. Many of AT&T's current CIID card holders received those CIID cards not upon request but rather as replacements for the unsolicited line number-based or Revenue Accounting Office number-based cards issued by AT&T to LEC calling card holders prior to and shortly after divestiture. Certainly, no other IXC had access to the LECs' base of calling card holders and card numbers. Therefore no other IXC is able to "create" a base of millions of CIID card holders by "piggy-backing" on the LECs' calling card customer bases.^{5/}

Further, as the Commission has recognized, distribution of CIID cards has enabled AT&T to exploit its market dominance by dramatically reducing the volume of calls which can be completed from public telephones presubscribed to other IXCs. This lower call completion rate and correspondingly lower number of commissionable calls has caused premises owners not to select other carriers as their presubscribed carriers, thereby

^{5/} AT&T has exploited the advantage resulting from its usurpation of the LECs' embedded base of calling card customers by accompanying those customers' unsolicited CIID cards with promotional materials which state falsely that "government regulations" require the issuance of these new cards in the CIID format. As the Commission is well aware, no such "government regulations" ever have been adopted by the Commission, the MFJ Court, Congress or any other government entity. Moreover, those same materials falsely inform card holders that their existing cards will no longer be acceptable after December 31, 1991 and that the customers should destroy their existing cards for their "own protection."

perpetuating AT&T's monopolization of the 0+ segment of the interexchange telecommunications market.^{6/}

In addition, distribution of CIID cards and the proprietary treatment accorded to those cards has imposed substantial operating costs on AT&T's IXC competitors. As the Commission acknowledged correctly in the Notice, every interLATA call made with a CIID card from a telephone presubscribed to another IXC causes that other IXC to incur access charges, validation costs, and operator time even though the calls must be turned away.^{7/} While recognizing that CIID cards cause IXCs to incur non-compensable costs, the Commission excluded certain of the unavoidable costs. Beyond those noted by the Commission, IXCs also lose use of portions of their switches as ports are tied up by incoming CIID card calls and they incur the interexchange transmission costs of routing such calls to their switches.

III. PROPRIETARY TREATMENT OF CIID CARDS NEITHER PROTECTS CONSUMERS NOR PROMOTES CONSUMER INTERESTS

According to the Notice, AT&T claims that CIID cards should be accorded proprietary status so that consumers can be assured of receiving service from AT&T when they use their CIID cards.^{8/} This argument simply does not withstand analysis.

6/ Notice, supra at para. 40.

7/ Id., n.42

8/ Id., at paragraph 37.

First, as a result of the provisions of TOCSIA as well as the Commission's operator service rules, consumers are fully apprised of the identity of the carrier whenever they place a call from a public phone or aggregator location. Under TOCSIA and the Commission's rules, the identity of the carrier must be posted either on or near the telephone.^{9/} Also, the carrier is required to identify itself audibly and distinctly, not once, but twice prior to a call being completed and charges incurred.^{10/} These carrier identification requirements are more than adequate to ensure that consumers are made aware of the carrier which will carry their calls, irrespective which carrier's logo is on the calling card they choose to use.^{11/}

Second, even today, consumers cannot be certain that calls made using their CIID cards will be AT&T calls. Whenever a consumer uses an AT&T CIID card to charge an intraLATA or local call, the call will be completed and billed not by AT&T -- the

^{9/} 47 U.S.C. §226(c) (1991).

^{10/} 47 U.S.C. § 226(b)(1)(A) and (2) (1991).

^{11/} In other businesses, it is not unusual for consumers to be able to use one company's credit card to charge products or services purchased from another company. For example, in the petroleum industry, it is common for one gasoline company to allow consumers to charge gas purchases using another company's credit card. In fact, in certain franchised monopoly situations (e.g., exclusive franchises to operate gas stations on turnpikes or other limited access roads), acceptance of competitors' credit cards is a requirement of the franchisor. So long as the identity of the company providing the gasoline is clearly marked, there is little probability that consumers will assume falsely that they are purchasing gas from the issuer of their credit card rather than the company whose name is on a sign that can be seen from the highway and that is on the gas pumps.

nominal card "issuer", but by a LEC. In such circumstances, if the consumer assumes that it will receive AT&T service -- and be charged AT&T rates -- by using its AT&T CIID card, its assumption will be incorrect. With the exception of those few consumers familiar with LATA boundaries and with the shared card arrangements that exist between AT&T and the LECs, the customer does not know that a carrier other than the card issuer will be completing the call and billing the call.

There is another, perhaps more important, reason why AT&T's proprietary treatment of CIID cards disservices the interests of consumers. Reliable telecommunications service is of primary import to the consuming public. As the Commission is all too well aware, service dependability has been jeopardized by a series of well-publicized network outages during the past year. Some of these outages have involved AT&T, but other carriers, both LEC and IXC, also have experienced network failures and service disruptions. The Commission's own concern about network outages has led it to form a Network Reliability Council.^{12/}

Proprietary calling cards used to access the card issuers' toll networks on a 0+ basis but unusable with any carrier except the card "issuer" will leave the consuming public wholly dependent upon the network of one carrier and all too vulnerable to loss of service when that carrier experiences a network outage. If AT&T is successful in persuading calling card

^{12/} See, FCC News Release, "Sikes Names Industrialist Paul Henson Chairman of Network Reliability Council" released December 13, 1991.

holders to replace their line-based or RAO number-based calling cards (which can be used to charge calls using many carriers) with CIID cards (usable only with AT&T), millions of traveling card holders will become totally dependent on one carrier for interexchange communications. If that one carrier's network fails -- as it has on several recent occasions, those consumers will be stranded. Unless those consumers carry other calling cards (notwithstanding AT&T's directive to destroy their line-based or RAO-based cards which could be used to charge calls to other carriers), those customers would become unable to complete operator-assisted calls. For such consumers, the benefits of availability of alternative services and networks would be meaningless. This is more than a theoretical possibility. Had AT&T's CIID card replacement strategy been fully implemented last fall when it experienced a major outage in the eastern corridor, many consumers would have been stranded in airports, hotels, along highways and other locations without the ability to place a long distance call.

IV. IF CIID CARDS ARE TO BE AFFORDED PROPRIETARY
TREATMENT, IT MUST BE ON AN ACCESS CODE DIALING
BASIS

For the reasons discussed in the preceding sections of these comments, PhoneTel does not believe that AT&T's CIID cards should be afforded proprietary treatment for interLATA calling. Notwithstanding these reasons, the Commission notes the oft-repeated lament by AT&T that it should be allowed to issue

proprietary calling cards since several of its competitors have done so.

There is, however, a fundamental difference between other carriers' proprietary cards and AT&T's CIID cards. Unlike the CIID cards, those other carriers' proprietary cards are not available for originating calls by dialing 0+. To use those cards, the caller must dial an access number provided by the carrier, e.g, either a 1-800, 950 or 10XXX number. This is a critical distinction. By limiting use of their proprietary cards to access code dialing, those carriers, unlike AT&T, are preventing consumers from wastefully flooding the network facilities of other IXCs -- and LECs -- with calls that cannot be billed and cannot be completed. When a consumer originates an operator-assisted call by dialing an access code, the call is routed by the LEC to the network of the IXC assigned that access code, not to the presubscribed IXC (unless the presubscribed IXC is also the carrier whose access code is dialed). While access code dialing does decrease the volume of calls reaching the presubscribed IXC, thereby reducing revenues earned by that IXC and commissions earned by the phone owner or premises owner, those calls at least do not waste the resources of the IXC nor do they cause consumers the inconvenience and frustration of being unable to complete calls. While some consumers may prefer not to dial access codes to complete calls, virtually all consumers strongly object to being told by an operator after they have

attempted to place a call that the call cannot be completed using their calling card.

0+ is an integral component of the North American Numbering Plan. It is in the public domain available for all consumers and for all carriers. If a carrier wishes to issue calling cards with proprietary calling characteristics, it should be required to utilize a dialing code exclusive to it, one that does not result in calls being routed to other carriers.

V. RESPONSES TO SPECIFIC QUESTIONS

In the Notice, the Commission solicited comment on several specific questions designed to assist it in implementing appropriate procedures for proprietary calling cards. PhoneTel will comment briefly on each of these questions.

1. How and by whom should the choice between a proprietary access code card and a nonproprietary 0+ card be made?
-

An IXC should have the right to issue proprietary access code cards to its customers, provided that such proprietary cards are, indeed, proprietary. That is, those cards should not be available for use with the services of any other carrier (LEC or IXC) and they should be usable only in connection with dialing codes that are proprietary to the issuing carrier. Such cards should be based entirely on that carrier's own numbering plan. If the carrier's cards contain numbers created in whole or in part by local exchange carriers as part of their

local exchange operations ^{13/} or by Bellcore on behalf of the LECs or if the calling cards are available to access the card "issuer" on a 0+ basis, they should be available to charge calls to any IXC, including the presubscribed IXC serving the originating telephone.

Similarly, consumers should be able to choose whether they wish to carry proprietary or nonproprietary cards, provided that they are accurately informed of the limitations inherent in any proprietary card, including the need for access code dialing and the possible unavailability of service if the card issuer experiences a service disruption, and that they are willing to accept those limitations.

2. How would IXCs distinguish and screen proprietary and nonproprietary card calls?

IXCs would distinguish between proprietary and nonproprietary card calls based on the card number provided by the caller -- either by dialing the digits or by orally providing the digits to a live operator. Unfortunately, these digits are not received by IXCs until after the call has been routed to their networks. By that time, it is too late for the IXC to avoid the incurrence of costs associated with calls that it cannot complete. Obviously, it would be preferable for the initial distinction between proprietary and nonproprietary card numbers to be made prior to the call reaching the IXC network.

13/ Cincinnati Bell Telephone Company, 6 FCC Rcd 3501 (1991).

That would require significant changes in how interexchange calling card calls are dialed.

3. Whether carriers should be obligated merely to instruct proprietary cardholders to dial access codes, or whether they should be required to reject 0+ calls by customers using proprietary calling cards?

When a caller wishes to place a call from a telephone presubscribed to the card-issuing carrier, it should make no difference whether the caller dials 0+ or the carrier's access code. Where a caller attempts to originate a 0+ call from a phone served by a carrier other than the card issuer, the call will reach the presubscribed carrier's network before that carrier can determine whether the call is to be charged to a proprietary calling card. Once that occurs, the damage has been done. The consumer will be told that its call cannot be completed. The presubscribed carrier will have incurred costs which cannot be recovered. Thus it would be preferable for the proprietary card-issuing carrier to prevent calls from being made from phones presubscribed to others except on a dial-up basis. Unfortunately, that may not be possible. If not, then proprietary card-issuing carriers must be required to carefully instruct callers not to place 0+ calls using proprietary cards except from phones presubscribed to it. Such instructions should be included in all informational materials sent with the cards as well as in print and electronic advertising. In fact, carriers should be required to provide such instructions on the

proprietary cards. Further, operators should be instructed in the appropriate dialing procedures.

4. What information would have to be made available to enable OSPs to carry and bill for nonproprietary 0+ calls?
-

Any IXC issuing calling cards in a nonproprietary format, including CIID cards, must be required to allow access to their validation databases to any carrier -- IXC or LEC -- in order to permit other carriers to accept calls charged to the nonproprietary cards. Specifically, other carriers would need to be able to access the data which enable the carrier to determine whether a CIID card or other nonproprietary card number is associated with an active account that can be billed.

5. What impact will the above-described proposal have on consumers?
-

Allowing calling cards usable on a 0+ basis to be accepted by competing carriers clearly is in the interest of consumers. It will increase consumer choice. It will ensure network and service redundancy in the event of service outages or other disruptions. It will promote competition by enabling smaller, regionally-based competitors to compete with the dominant carrier in the provision of operator-assisted services. It will promote lower rates. Access to multiple carriers will stimulate price as well as service competition among carriers.

6. What impact might this proposal have on the costs and benefits of billed party preference or the timeliness with which it could be implemented?

The proposal contained herein, if adopted, will ensure that consumers are able to reach their preferred carriers and

that they are informed which carrier will complete their call. It will also ensure that callers are able to knowingly choose whether or not they prefer to use a proprietary card. All this will be achieved at little or no additional cost to anyone. In contrast, billed party preference, if and when it can be implemented, will be costly. It will be expensive to implement by LECs. Those costs will eventually be shifted to IXC's and ultimately to consumers. In its billed party preference comments, PhoneTel will discuss the cost and other disadvantages of billed party preference. The proposal recommended herein, if adopted, will obviate any need for a system of billed party preference.

CONCLUSION

In view of the foregoing, PhoneTel respectfully urges the Commission to:

1. forbid calling cards issued in the CIID format from being used to charge calls to any carrier -- IXC or LEC -- other than the "issuing" carrier unless those cards are made available on a nondiscriminatory basis for validation and acceptance by all carriers desiring to be able to validate and accept those cards;

2. prohibit all proprietary calling cards (i.e., those that are issued in a proprietary format and not available for validation by any other carriers) from being available for use on a 0+ basis;

3. require any carrier issuing proprietary calling cards to furnish card holders with appropriate dialing instructions in promotional materials and on the cards themselves. Such instructions should indicate that 0+ dialing is not allowed unless the originating telephone is presubscribed to the card issuing carrier;

4. direct AT&T and any other carrier which has used false and misleading statements in materials accompanying distributed calling cards in the CIID format to cease and desist from distributing materials containing such false and misleading statements and to send written statements to all recipients of such materials correcting those previously sent.

Respectfully submitted,

PHONETEL TECHNOLOGIES, INC.


Mitchell F. Brecher

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Its Attorneys

June 2, 1992

CERTIFICATE OF SERVICE

I, Pamela M. DuBost, do hereby certify that on this 2nd day of June, 1992, I have caused a copy of the foregoing Comments of Phonetel Technologies, Inc. on Proprietary Calling Cards and 0+ Access to be delivered by hand to each of the parties on the service list below.

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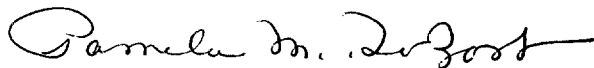
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